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February 20, 2020

VIA ECF

Hon. Cecelia G. Morris,
Chief United States Bankruptcy Judge
for the Southern District of New York,
United States Bankruptcy Court,
355 Main Street,
Poughkeepsie, New York 12601

Re: *In re Dunn*,
Case No. 18-36566(CGM)

Dear Honorable Madam:

I am counsel for the Debtor in the above-captioned bankruptcy case. I write to Your Honor in connection with the Debtor's Motion to Vacate Order Granting Limited Relief from the Automatic Stay to Conclude State Court Litigation and Reimposing the Automatic Stay that is returnable on February 25, 2020 at 9:30 AM, Dkt. No. 64. Today, Chief Judge McMahon consolidated the appeals concerning the Order Dismissing Adversary Proceeding for Failure to Prosecute and the Order Denying Motion to Vacate Order Dismissing Case For Failure to Prosecute. In addition, Chief Judge McMahon has issued an Order containing a briefing schedule. The following is the briefing schedule for the consolidated appeals: Appellant's brief and record due April 2, 2020; Appellees' opposition brief is due May 14, 2020; Appellant's reply brief is due June 3, 2020. Attached is a copy of Chief Judge McMahon's Order.

It is respectfully submitted that the consolidated appeals briefing schedule is another cogent reason why Your Honor should vacate this Court's prior order granting limited relief from the automatic stay and reimpose the automatic stay against LAK3, LLC. It is uncertain when the consolidated appeals will be decided. LAK3, LLC should not be allowed to proceed against the Debtor in state court while the consolidated appeals are being adjudicated because this will be highly prejudicial to the Debtor.

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Thank you for your consideration.

Respectfully submitted,

/s/ Carlos J. Cuevas

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cc: Counsel of Record (Via ECF)